

1 HEATHER E. WILLIAMS, Bar #122664
2 Federal Defender
3 BENJAMIN A. GERSON, NY Bar # 5505144
4 Assistant Federal Defender
5 Designated Counsel for Service
6 2300 Tulare Street, Suite 330
7 Fresno, CA 93721-2226
8 Telephone: (559) 487-5561
9 Fax: (559) 487-5950

10 Attorneys for Defendant
11 JOSE FERNANDO GOMEZ-MOREIRA

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 vs.
19 JOSE FERNANDO GOMEZ-
20 MOREIRA,
21 Defendant.

22 Case No. 1:20-cr-00151-NONE-SKO

23 **STIPULATION TO CONTINUE STATUS
24 CONFERENCE**

25 Date: February 17, 2021
26 Time: 1:00 p.m.
27 Judge: Hon. Sheila K. Oberto

28 The parties, through their respective counsel, Laura Withers, Assistant United States
29 Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender,
30 counsel for the defendant, Jose Fernando Gomez-Moreira, hereby stipulate and jointly move this
31 Court to continue Mr. Gomez-Moreira's status conference from January 20, 2021 to February 17,
32 2021.

33 The defense is still awaiting receipt of records necessary to Mr. Gomez-Moreira's case. On
34 December 17, 2020, defense counsel received assurances that the requested records would be
35 expedited. Despite these assurances the records have yet to arrive.

36 The parties request this continuance with the intention of conserving time and resources
37 for both the parties and the Court. The parties agree that the delay resulting from the continuance
38 shall be excluded in the interests of justice, including but not limited to, the need for the period

1 of time set forth herein for effective defense preparation, defense investigation, and plea
2 negotiation purposes pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

3 Respectfully submitted,

4 McGREGOR SCOTT
5 United States Attorney

6 Dated: January 13, 2021

/s/ Laura Withers
7 LAURA WITHERS
8 Assistant U.S. Attorney

9 Dated: January 13, 2021

10 HEATHER E. WILLIAMS
11 Federal Defender

12 */s/ Benjamin A. Gerson*
13 BENJAMIN A. GERSON
14 Assistant Federal Defender
15 Attorney for Defendant
16 JOSE FERNANDO GOMEZ-MOREIRA

17 **O R D E R**

18 **GOOD CAUSE APPEARING**, the above stipulation to continue case 1:20-cr-00151 to
19 February 17, 2021, is hereby accepted and adopted as the order of this Court.

20 IT IS SO ORDERED.

21 Dated: January 14, 2021

/s/ Sheila K. Oberlo
22 UNITED STATES MAGISTRATE JUDGE